

# Concerned Operators of Television Program Networks

March 25, 2011

## VIA ECFS

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**Re: Recommendations Approved by the Advisory Committee for the  
2012 World Radiocommunication Conference  
DA 11-447  
IB Docket No. 04-286**

Dear Ms. Dortch:

The undersigned operators of major television program networks (the “Programmers”) submit this letter in response to the FCC’s Public Notice seeking comment on recommendations of the Advisory Committee for the 2012 World Radiocommunication Conference (“WRC-12”).<sup>1/</sup> In particular, the Programmers write to address the recommendations of the Advisory Committee’s Informal Working Group-2 (“IWG-2”) for inclusion of an item on the agenda for the WRC in 2015 (“WRC-15”) regarding the spectrum requirements of mobile broadband wireless access (“BWA”) systems. If the U.S. Government deems it advisable to propose an item on BWA spectrum for the WRC-15 agenda, then the Programmers submit that IWG-2’s “Proposal B” should be the basis for the U.S. position.

Because the IWG-2 was unable to reach a consensus on a proposal regarding a WRC-15 agenda item on BWA, the Working Group forwarded two proposals – Proposal A and Proposal B – for the Advisory Committee’s consideration. Both proposals recommend that WRC-15 address the spectrum needs of BWA systems. From the Programmers’ perspective, however, Proposal B is preferable because unlike Proposal A, it does not include, as a potential source of spectrum for BWA, the C-Band spectrum currently allocated to the Fixed Satellite Service (“FSS”).

The Programmers are today, and have been for decades, some of the primary users of C-Band FSS satellites. The networks listed at the conclusion of this letter are currently distributed by C-Band satellites to thousands of reception points, including those at cable television systems, direct-to-home satellite operators, telcos, broadcast stations, and other distributors located in urban, suburban, rural and remote areas throughout the world. From these

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<sup>1/</sup> *FCC Seeks Comment on Recommendations Approved by the Advisory Committee for the 2012 World Radiocommunication Conference*, Public Notice, DA 11-447, IB Docket No. 04-286 (rel. March 10, 2011) (“Public Notice”).

reception points, the Programmers' content is distributed to hundreds of millions of consumers domestically and abroad.

The extensive C-Band infrastructure used to distribute a vast array of information and entertainment programming to consumers could be subject to crippling interference if C-Band receive frequencies (3650 MHz to 4200 MHz) were populated with mobile BWA transmitting devices. Even small levels of interference from mobile transmitting devices into satellite reception facilities could create harmful interference and disrupt programming. Moreover, the ubiquity of C-Band satellite reception points for video content throughout the world makes typical interference avoidance practices such as coordination requirements or exclusion zones around earth station facilities impractical for mitigating interference from mobile transmitters.

IWG-2's Proposal B appropriately recognizes these interference issues, noting that, "ITU-R has already conducted compatibility studies between FSS and BWA systems [and] FSS and IMT systems . . . that shows these systems are not compatible."<sup>2/</sup> Accordingly, unlike Proposal A, Proposal B excludes C-Band frequencies from consideration in any studies or proposals designed to identify additional spectrum for BWA systems. Even with this constraint, Proposal B still identifies ample spectrum within a 3000 MHz range (from 400 MHz to 3400 MHz) for possible further study for BWA use via a WRC-15 agenda item.<sup>3/</sup>

For the foregoing reasons, the Programmers submit that if the U.S. proposals at WRC-12 were to contain a recommendation for a WRC-15 agenda item related to the potential spectrum needs of BWA systems, the IWG-2's Proposal B should form the basis for any such recommendation.

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<sup>2/</sup> *Public Notice*, Attachment 1 at 26.

<sup>3/</sup> *Public Notice*, Attachment 1 at 13-27.

Respectfully submitted,

*/s/ Howard Jaeckel*

Howard Jaeckel, Senior Vice President,  
Associate General Counsel  
CBS Television Network

*/s/ John C. Miller*

John C. Miller, Senior Vice President,  
Technology and Distribution  
Discovery Networks, LLC

*/s/ Andrew Setos*

Andrew Setos, President of Engineering  
FOX Broadcasting Company and FOX Cable  
Networks, Inc.

*/s/ Robert M. Zitter*

Robert M. Zitter, Executive Vice President,  
Technology, and Chief Technology Officer  
Home Box Office, Inc.

*/s/ Margaret L. Tobey*

Margaret L. Tobey, Vice President,  
Regulatory Affairs  
NBC Telemundo License LLC

*/s/ Michael L. Ward*

Michael L. Ward, Senior Vice President,  
Deputy General Counsel,  
Showtime Networks Inc.

*/s/ Susan L. Fox*

Susan L. Fox, Vice President,  
Government Relations  
The Walt Disney Company  
On Behalf of The ABC Television Network,  
ESPN, and the Disney ABC Cable Networks  
Group

*/s/ Scott Teissler*

Scott Teissler, Executive Vice President,  
Chief Technology Officer, Chief Digital  
Strategy Officer  
Turner Broadcasting System, Inc.

*/s/ Keith Murphy*

Keith Murphy, Vice President,  
Government Relations  
Viacom Inc.

*/s/ Darcy Antonellis*

Darcy Antonellis, President,  
Warner Bros. Technical Operations  
Warner Bros. Technical Operations Inc.

**Programmers' Networks Distributed via C-Band Satellites**

**CBS**

CBS TV Network Domestic

CBS East Coast Main  
CBS East Coast Backup  
CBS West Coast Main  
CBS West Coast Backup  
CBS Regional Network -1  
CBS Regional Network -2  
CBS Regional Network -3  
CBS Regional Network -4  
CBS Worldwide Distribution (CWD) of Syndicated  
Programming to ABC, CBS, CW, FOX, NBC,  
MYNetwork, and Independent stations.

CW TV Network Domestic

CW East Coast Main  
CW East Coast Backup  
CW West Coast Main  
CW West Coast Backup

**Discovery Networks, LLC**

Discovery Domestic

Discovery Channel  
Discovery Channel HD  
DMAX Digital  
DMAX Analog  
OWN East  
Discovery Kids  
Discovery Science  
Planet Green  
ID  
BBC America East  
The Military Channel  
Discovery Fitness and Health  
TLC East  
TLC Canada  
BBC America West  
OWN West  
Discovery HD Theater  
Discovery East  
Discovery West  
DDG  
Animal Planet East  
Animal Planet West  
TLC West  
Discovery HD Channel  
TLC HD  
Planet Green HD

Discovery International

Animal Planet – Australia  
Animal Planet – India  
Animal Planet – Japan  
Animal Planet – South East Asia  
Animal Planet – Taiwan  
Discovery Channel - Australia  
Discovery Channel – China (China Services)  
Discovery Channel - India  
Discovery Channel - Japan  
Discovery Channel - Korea  
Discovery Channel – New Zealand  
Discovery Channel - Philippines  
Discovery Channel – South East Asia  
Discovery Channel - Taiwan  
Discovery Channel – Malaysia  
Discovery HD -Japan  
Discovery HD –North East Asia  
Discovery HD –South East Asia  
Discovery HD -India  
Home & Health – Australia/New Zealand  
Home & Health – South East Asia  
Science – Australia/New Zealand  
Science – India

**Programmers' Networks Distributed via C-Band Satellites**

Animal Planet HD  
 Science HD  
 BBC America HD  
 ID HD  
 HUB HD  
 OWN HD  
 3Net

Science – South East Asia  
 TLC – Australia/New Zealand  
 TLC – India  
 TLC – South East Asia  
 TLC – Taiwan  
 TLC Malaysia  
 Turbo – Australia/New Zealand  
 Turbo – India  
 Turbo – South East Asia  
 Animal Planet Brazil  
 Animal Planet Latin  
 Animal Planet Argentina  
 Discovery Argentina  
 Discovery Brazil  
 Discovery Civilization  
 Discovery Espanol  
 Discovery Familia  
 Discovery Kids Argentina  
 Discovery Kids Brazil  
 Discovery Kids Latin  
 Discovery Kids Mexico  
 Discovery Latin  
 Discovery Mexico  
 Discovery Science  
 Discovery Turbo  
 Discovery Sao Paolo  
 Discovery Venezuela  
 HD Theater  
 Home & Health Brazil  
 Home & Health Latin  
 Home & Health Mexico  
 Home & Health Argentina  
 Home & Health Sao Paolo  
 LIV Argentina  
 LIV Brazil  
 LIV Latin  
 LIV Mexico  
 TLC HD  
 Travel & Living Latin  
 Travel and Living Argentina  
 Animal Planet Benelux  
 Animal Planet Europe  
 Animal Planet HD Europe  
 Animal Planet Italy  
 Animal Planet Nordic  
 Animal Planet Poland  
 Animal Planet Romania  
 Animal Planet Russia  
 Animal Planet UK

**Programmers' Networks Distributed via C-Band Satellites**

Animal Plant UK Plus One  
ID Turkey  
Discovery Channel Africa  
Discovery Channel Benelux  
Discovery Channel Bulgaria  
Discovery Channel Denmark  
Discovery Channel Europe  
Discovery Channel Finland  
Discovery Channel Flanders  
Discovery Channel France  
Discovery Channel Hungary  
Discovery Channel Iberia  
Discovery Channel Ireland  
Discovery Channel Italy  
Discovery Channel Middle East  
Discovery Channel Norway  
Discovery Channel Poland  
Discovery Channel Romania  
Discovery Channel Russia  
Discovery Channel Sweden  
Discovery Channel UK  
Discovery Channel UK Plus One  
Discovery High Definition Europe  
Discovery High Definition UK  
DMAX UK  
DMAX UK Plus One  
DMAX UK Plus Two  
History Poland  
Home & Health UK  
Home & Health UK Plus One  
ID Europe  
ID UK  
Knowledge UK  
Knowledge UK Plus One  
Quest UK  
Quest UK Plus One  
Real Time France  
Real Time Italy  
Real Time UK  
Real Time UK Plus One  
Science Europe  
Science Poland  
Science UK  
Science UK Plus One  
SHED UK  
TLC Balkans  
TLC Norge  
TLC Romania  
TLC Russia  
TLC Swede  
Travel & Living Europe

**Programmers' Networks Distributed via C-Band Satellites**

Travel & Living Poland  
Travel & Living UK  
Turbo UK  
World Europe  
World Poland

**Fox Broadcasting Company & Fox Cable Networks, Inc.**

Fox Domestic

FOX Broadcast Network

Cable:

FOX News  
FOX Business Network  
FX (E and W feeds)  
Speed Channel  
National Geographic Channel (E and W feeds)  
FOX College Sports (3 regions)  
FOX Regional Sports Networks  
Soccer Channel  
Soccer Plus  
Soccer en Espanol  
FOX Movie Channel  
National Geographic Wild  
Fuel Channel  
The Big Ten Network

Fox International Networks

FOX News  
FOX Business Network

**Home Box Office, Inc.**

HBO Domestic

HBO  
HBO 2  
HBO Signature  
HBO Family  
HBO Latino  
HBO Comedy  
HBO Zone  
Cinemax  
MoreMAX  
ActionMAX  
ThrillerMAX  
WMAX  
@MAX  
5StarMAX  
OuterMAX  
HBO On Demand  
Cinemax on Demand

HBO International

HBO Asia  
HBO  
HBO Signature  
HBO Family  
HBO Hits  
HBO India (South Asia)  
HBO Malaysia  
HBO China  
Cinemax  
RED  
WBTB  
HBO Latin America  
HBO  
HBO Plus  
HBO Family  
HBO Caribe  
HBO Brazil  
HBO 2 Brazil  
HBO Plus Brazil  
Cinemax

**Programmers' Networks Distributed via C-Band Satellites**

MAX Prime  
MAX Brazil  
MAX Pan Americana  
MAX Mex and C.A.  
WBTB P.R.  
WBTB Mexico  
WBTB Brasil  
WBTB Andes  
WBTB Andes 2

**NBC Telemundo License LLC**

NBCUniversal Domestic  
Atlanta Sports Network  
Bay Area Sports Network  
Bravo  
Chicago Sports Network  
Chiller  
CNBC  
CNBC World  
E! Entertainment  
G4  
Golf Channel  
Mid-Atlantic Sports Network  
Mountain Sports Network  
MSNBC  
mun2  
NBC Television Network  
New England Sports Network  
Oxygen  
Portland Sports Network  
Sleuth  
SNY  
Sports Network West  
Sprout  
Style  
SyFy  
Telemundo  
TV One  
Universal HD  
USA Network  
Versus  
WNBC America

NBCUniversal International  
Pakistan  
CNBC Pakistan  
India  
CNBC TV 18  
Asia Pacific  
CNBC Asia Pacific  
Hallmark  
Kids Co  
Sci Fi  
Universal  
Australia  
Kids Co  
Latin America  
CNBC Latin America  
Mun2  
Sci Fi  
Studio Universal  
Argentina  
Studio Universal  
Brazil  
Studio Universal  
Mexico  
Studio Universal  
Philippines  
Sci Fi

**Showtime Networks Inc.**

Showtime Domestic  
SHOWTIME  
SHOWTIME 2  
SHOWTIME SHOWCASE  
SHOWTIME EXTREME



**Programmers' Networks Distributed via C-Band Satellites**

SHOWTIME BEYOND  
 SHOWTIME NEXT  
 SHOWTIME WOMEN  
 SHOWTIME FAMILY ZONE  
 THE MOVIE CHANNEL  
 THE MOVIE CHANNEL XTRA  
 FLIX  
 SHOWTIME ON DEMAND  
 THE MOVIE CHANNEL ON DEMAND  
 FLIX ON DEMAND

**The Walt Disney Company and Affiliated Companies**  
**(ABC, ESPN, and Disney ABC Cable Networks Group)**

Domestic

ABC Television Network  
 ESPN  
 ESPNNEWS  
 ESPN Deportes  
 ESPN 2  
 ESPN  
 ESPNHD  
 ESPNNEWS HD  
 ESPN2HD  
 ESPNHD  
 Goal Line  
 ESPN Classic  
 ABC News NOW  
 ESPN Pay-Per-View  
 Disney Channel East  
 ABC Family East  
 Disney XD East  
 Disney Channel East HD  
 Disney XD East HD  
 ABC Family East HD  
 Disney Channel West  
 ABC Family West  
 Disney XD West  
 Disney Channel West HD  
 Disney XD West HD  
 ABC Family West HD  
 SOAPnet East  
 SOAPnet West  
 DADTV

International

ESPN  
 ESPN2  
 ESPN Latin North  
 ESPN Mexico  
 ESPN Caribbean  
 ESPN2 Caribbean  
 ESPN Venezuela  
 ESPN Dos Venezuela  
 ESPN Dos Mexico  
 ESPN Pacific Rim  
 ESPN Atlantic  
 ESPN Middle East  
 ESPN Syndicated Channels  
 Disney Channel France  
 Playhouse Disney France  
 Disney XD France  
 Cinemagic France  
 Cinemagic HD France  
 Disney Channel Germany  
 Playhouse Disney Germany  
 Disney XD Germany  
 Cinemagic Germany  
 Disney Channel Spain  
 Playhouse Disney Spain  
 Disney XD Spain  
 Cinemagic Spain  
 Cinemagic HD Spain  
 Disney Channel Portugal  
 Cinemagic Portugal  
 Disney Channel Israel  
 Disney Channel Italy  
 Disney Channel Russia  
 Disney Channel UK  
 Playhouse Disney UK  
 Cinemagic UK  
 Disney Channel Scandinavia  
 Playhouse Disney Scandinavia

**Programmers' Networks Distributed via C-Band Satellites**

Disney XD Scandinavia  
Disney Channel Poland  
Disney XD Poland  
Disney Channel Romania  
Disney Channel South Africa  
Disney Channel Asia  
Playhouse Disney Asia  
Disney XD India  
Disney Channel India  
Disney Channel Hong Kong  
Disney Channel Australia  
Playhouse Disney Australia/New Zealand  
Disney Channel New Zealand  
Disney Channel Taiwan  
Disney Channel North  
Playhouse Disney North  
Disney XD  
Disney Channel South  
Playhouse Disney South  
Disney XD South  
Disney XD Pacific

**Turner Broadcasting Company**

Turner North America  
CNN AIRPORT NETWORK  
CNN  
CNN en Español  
CNN International  
HLN  
TBS  
TNT  
CARTOON NETWORK  
TCM  
truTV  
BOOMERANG  
HTV  
INFINITO  
PEACHTREE TV/WPCH CANADA  
TCM CANADA  
NBATV  
CNN MOBILE  
CNN RADIO  
CNN iTV (Interactive)  
CARTOON MOBILE  
ADULT SWIM

Turner International  
Latin America  
CNN Spanish Radio  
CNN en Español  
CNN en Español Venezuela  
CNN en Español Mexico  
CNN International  
HLN  
International NewSource  
ISAT Brazil  
ISAT Pan Regional  
Space Brazil  
Space Pan Regional  
Space Mexico  
Infinito US  
FTV Brazil  
FTV SUR  
FTV Pan Regional  
TNT MEXICO  
TNT Brazil  
TNT Chile  
TNT Argentina  
TNT NORTH  
TCM Pan Regional  
TCM BRAZIL  
Cartoon Pan Regional

**Programmers' Networks Distributed via C-Band Satellites**

Cartoon BRAZIL  
Cartoon MEXICO  
Cartoon ARGENTINA  
Boomerang Pan Regional  
Boomerang BRAZIL  
Boomerang MEXICO  
Infinito Sur  
Infinito Brazil  
Infinito Lusitano  
Infinito Pan Regional  
Venus PAL  
Venus PAL 2  
Venus Portuguese  
Lifestyle TV  
Lifestyle Diferido  
TRUTV  
ISat  
Space  
Playboy Digital +  
Playboy Latino  
Playboy Latino US  
Playboy Latino Portuguese  
HTV  
MUCH Latino  
Much Music Sur  
TCM Argentina  
TOONCAST

**Viacom Inc.**

MTV Network Domestic

MTV  
MTV2  
MTV Jams  
MTV Tr3s  
Nickelodeon  
Nick Toons  
Nick Jr  
Teen Nick  
Comedy Central  
Spike TV  
CMT  
TV Land  
VH1  
VH1 Classic  
VH1 Soul

MTV International

MTV Canada  
Spike Canada  
MTV Asia  
MTV China  
MTV Asia  
Nickelodeon NZ  
Nickelodeon SE  
MTV India  
MTV India  
VH1 India  
Nickelodeon Indian  
Colors  
MTV Latin America  
MTV  
MTV Venezuela  
MTV Hits

**Programmers' Networks Distributed via C-Band Satellites**

VH1 Pure Country  
Logo  
mtvU  
Paladia  
BET  
BET J  
BET Gospel  
BET Hip Hop  
Epix 1  
Epix 2  
Epix 3

MTV Jams  
Nickelodeon Latino  
Nickelodeon Latino Brazil  
Nickelodeon Latino South  
Nick Jr. LA  
VH1 Latino  
VH1 Argentina  
VH1 Brazil  
VH1 Soul  
VH1 Classic  
VH1 Mega Hits  
MTVN International

**Warner Bros.**

Warner Bros. Domestic

CW (Joint venture with CBS)

Warner Bros. International

Warner Channel Puerto Rico  
Warner Channel Mexico  
Warner Channel Brazil  
Warner Channel Andes  
Warner Channel Andes 2  
Warner TV Asia  
WB India